

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
FOLLOW-UP INTERROGATORIES TO
NASHUA PHOTO INC., DISTRICT PHOTO INC., MYSTIC COLOR LAB, AND
SEATTLE FILMWORKS, INC. WITNESS HALDI
(USPS/NDMS-T3-44-45)

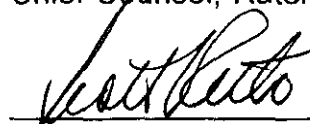
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to Nashua Photo Inc., District Photo Inc., Mystic Color Lab, and Seattle Filmworks, Inc. witness Haldi: USPS/NDMS-T3-44-45.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Rate-making



Scott L. Reiter

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(202) 268-2999; Fax -5402
February 4, 1998

USPS/NDMS-T3-44. Please refer to your response to USPS/NDMS-T3-17 where you state that "Parcels, by contrast, are still sorted on the SPBS".

- (a) Please provide the basis for this understanding.
- (b) Is it your testimony that all Standard Mail (A) parcels are sorted at plants (P&DCs)? If not, please provide an estimate of the percentage.
- (c) Are you aware that machines other than an SPBS can sort Standard Mail (A) parcels at plants? If so, please describe them and list the nationally representative percentage you believe receive piece sortation on them by machine.
- (d) Is it your testimony that no Standard Mail (A) parcels receive piece sortation on BMC Parcel Sorting Machines (PSMs)? If your answer is no, please provide the nationally representative percentage you believe do.
- (e) Are you aware that PSMs have barcode readers?

USPS/NDMS-T3-45. Please refer to your response to USPS-NDMS-T3-26(a).

- (a) Is it your testimony that price is the key decision making criterion for customers deciding whether or not to have their film developed by mail? If so, do you believe that 10 cents will cause them to pursue other options? Please provide any evidence you might have to support your claims.
- (b) Are other factors, such as convenience, timeliness, quality, or reliability, of equal or greater importance than price for customers deciding whether to have their film developed by mail?
- (c) Please provide the rates that UPS would charge for delivering developed film packages of the type your clients send. Would you characterize the difference between those rates and the rates you now pay as "staggering" or something different? Please explain.
- (d) Please estimate for your clients' businesses the percentage of total costs that the 10-cent surcharge would comprise.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

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